

REMARKS

The Examiner's comments from the Office Action mailed August 10, 2007 have been carefully considered. Claims 1-42 remain pending in the application. Reexamination and allowance of claims 1-42 are respectfully requested.

Anticipation Rejections

Lui et al.

Claims 1, 3, 5-7, 10, 23, 25, 30, 32, 35, and 37 have been rejected under 35 U.S.C. 102(b) as being anticipated by Lui et al. ("Interoperability of Peer-to-Peer File Sharing Protocols," August 2002) (hereinafter, "Lui"). Applicants respectfully traverse the rejection.

Claim 1 recites, in part, replacing at a second computer system a user-friendly handle in a request for documents stored on a first computer system with a machine location of the first computer system. The user-friendly handle identifies a principal of the first computer system.

Applicants respectfully point out the term "replacing" indicates the user-friendly handle is removed from the request and the machine location is added to the request in place of the user-friendly handle.¹

Lui fails to disclose or suggest *replacing* at a second computer system a user-friendly handle identifying a principal with a machine location in a request from a user of the second computer system for documents stored at the first computer system. In fact, Lui does not even disclose or suggest *replacing* a user-friendly handle with a machine location.

Rather, Lui proposes a new P2P gateway system that receives messages from different protocols and converts them into a specific protocol. See *Lui*, page 32 and Figure 6. The gateway system does not replace a user-friendly handle with a machine location in a request. The requests received by the gateway system already contain machine locations.

Furthermore, none of the existing P2P systems described in Lui disclose or suggest *replacing* at a requesting computer system a user-friendly handle with a machine location. To

¹ See the Random House Unabridged Dictionary, © Random House, Inc. 2006, as found at Dictionary.com, Version 1.1, on September 4, 2007 (1. to assume the former role, position, or function of; **substitute for** (a person or thing); 2. **to provide a substitute** or equivalent **in the place of**; 3 to restore; return; make good; and 4. to restore to a former or the proper place) (emphasis added).

find a file in a Freenet network, a sending node sends a "DataRequest" message specifying a search key. See *Lui*, page 29. The search key is sent to computers using network addresses stored in a dynamic routing table maintained on the sending node. See *Lui*, page 28. The sending node in *Lui* does not replace a user-friendly handle in the "DataRequest" message with a machine location. Rather, the message is simply generated with a machine location.

To request a file in a Gnutella network, a requesting computer discovers peer computers using "Ping" and "Pong" messages. The requesting computer sends a "Query" message to the discovered computers. The "Query" message contains a string specifying the set of files that the user requests. The requesting computer does not replace a user-friendly handle with a machine location. First, contrary to the assertion on page 3 of the Office Action, a User Datagram Protocol (UDP) is not equivalent to a user-friendly handle. A User Datagram Protocol does not identify a principal of the first (i.e., destination) computer system. Rather, only a destination port is identified. Second, even if the UDP is equivalent to a user-friendly handle, a point Applicants do not concede, the UDP is not *replaced* with a machine location. In fact, no piece of information in the "Query" message or any other message sent within the Gnutella system is *replaced* with a machine location.

In Napster systems, a server receives from a requesting computer a request identifying a nickname of a peer storing files desired by the requesting computer. The requesting computer cannot replace the nickname in the request with a machine location since it does not yet know the machine location. The server sends a response message to the requesting computer including, *inter alia*, the IP address of the peer that hosts the file and the port number of the peer. The server is not equivalent to the second computer system recited in claim 1 because the request for access to documents is not sent from a user of the server. Rather, the request is sent from a user of the requesting computer. The requesting computer sends to the peer hosting the desired file a request including the nickname of the *requesting* computer after making a TCP connection to the hosting peer. The hosting peer replies through the TCP connection. Accordingly, neither the requesting computer nor the hosting computer *replaces* a user-friendly handle (e.g., a nickname) with a machine location.

For at least these reasons, Lui does not anticipate claim 1. Claims 2-6 depend from claim 1 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 1-6 is respectfully requested.

Claim 7 recites, in part, resolving at the accessing node the user-friendly handle identifying a principal with the machine location in a request for access to documents from a user of the accessing node. The request is made from the accessing node to the publishing node.

Applicants respectfully point out the term "resolving" refers to *substituting* (i.e., replacing) the user-friendly handle with a machine location. See the present application at page 21, lines 1-5.

As discussed above with respect to claim 1, Lui does not disclose or suggest resolving (i.e., substituting or replacing) at an accessing node a user-friendly handle with a machine location in a request for access to documents made from the accessing node.

For at least these reasons, Lui does not anticipate claim 7. Claims 8-22 depend from claim 7 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 7-22 is respectfully requested.

Claim 23 recites, in part, amending the request at the second computer system to *replace* a user-friendly handle identifying a principal with the machine location.

In contrast, Lui does not disclose or suggest amending at a second computer system a request from a user of the second computer system by *replacing* a user-friendly handle with a machine location for at least the same reasons as discussed above with respect to claim 1.

For at least these reasons, Lui does not anticipate claim 23. Claims 24-29 depend from claim 23 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 23-29 is respectfully requested.

Claim 30 recites, in part, a name resolution module that intercepts the requests for access to documents stored on a second computer system and amends each request to replace a user-

friendly handle identifying a principal of a first computer system with a machine location of the first computer system.

Lui does not disclose or suggest a computer system having a name resolution module for amending requests for access to documents to *replace* a user-friendly handle with a machine location for at least the same reasons as discussed above with respect to claim 1.

For at least these reasons, Lui does not anticipate claim 30. Claims 31-34 depend from claim 30 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 30-34 is respectfully requested.

Claim 35 recites, in part, amending at an accessing computer system a request for access to documents stored on a publishing computer system to replace a user-friendly handle identifying a principal of the publishing computer system with a machine location of the publishing computer system.

For at least the same reasons as discussed above with respect to claim 1, Lui fails to disclose or suggest amending at an accessing computer system a request for access to documents stored on a publishing computer system to *replace* a user-friendly handle identifying a principal of the publishing computer system with a machine location of the publishing computer system.

For at least these reasons, Lui does not anticipate claim 35. Claims 36-42 depend from claim 35 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 35-42 is respectfully requested.

Boyle

Claims 1, 3-7, 10-15, 17, 19-23, 25-30, 32-35, and 37-42 have been rejected under 35 U.S.C. 102(b) as being anticipated by Boyle et al. (U.S. Patent No. 5,872,847, hereinafter “Boyle”). Applicants respectfully traverse the rejection.

In contrast to claim 1, Boyle does not disclose or suggest replacing at a second computer system a user-friendly handle identifying a principal with a machine location in a request from a user of the second computer system. In fact, Boyle does not even disclose or suggest replacing a user-friendly handle with a machine location.

Contrary to the assertions on page 3 of the Office Action, the IP address and security parameters in Boyle are not equivalent to a user-friendly handle. As stated on page 2, lines 10-11 of the present application, "IP addresses are not user-friendly because they contain only numbers with no readily understandable meaning." The Applicants have specifically defined a "user-friendly handle" to not include IP addresses. As noted in the present disclosure, "[a]n email address is an exemplary example of a user-friendly handle and an IP address or public key are exemplary examples of machine locations." *Id.* at page 4, lines 14-15.

Furthermore, even if the IP address and security parameters in Boyle are equivalent to a user-friendly handle, a point Applicants do not concede, Boyle still doesn't disclose or suggest *replacing* in a request for access to documents the IP address of the computer storing the documents with a machine location of the computer storing the documents. Rather, Boyle discloses a requesting host establishing trusted communications with a target host by determining the Internet Protocol (IP) address of the target host through the use of Address Resolution Protocol (ARP). *Boyle*, Abstract.

To use ARP, the requesting host broadcasts an ARP request message (i.e., not a request for access to documents) containing the IP address of the target host. The target host returns to the requesting host a hardware address of the target host. The target host is not equivalent to the second computer system recited in claim 1 because a request for access to documents is not sent from a user of the target host. Furthermore, the requesting host is not equivalent to the second computer system recited in claim 1 because the requesting host does not *replace* a user-friendly handle with a machine location in a request for access to documents. Any subsequent request after receiving the response from the target host would either contain the IP address of the target host (i.e., the IP address would not be replaced) or would not be generated with the IP address from the outset.

For at least these reasons, Boyle does not anticipate claim 1. Claims 2-6 depend from claim 1 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 1-6 is respectfully requested.

In contrast to claim 7, Boyle does not disclose or suggest resolving at an accessing node a user-friendly handle identifying a principal with a machine location of a publishing node in a request for access to documents, which stored on the publishing node, made from the accessing node.

Rather, Boyle discloses obtaining an IP address of a target host using an ARP process. The ARP process does not include replacing a user-friendly handle in a request with a machine location at the accessing node for at least the same reasons as discussed above with respect to the rejection of claim 1 over Boyle.

For at least these reasons, Boyle does not anticipate claim 7. Claims 8-22 depend from claim 7 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 7-22 is respectfully requested.

In contrast to claim 23, Boyle does not disclose or suggest amending at a second computer system a request from a user of the second computer system to access documents to replace a user-friendly handle with a machine location.

Rather, the Boyle reference discloses obtaining an IP address of a target host using an ARP process. The ARP process does not include replacing a user-friendly handle in a request with a machine location at the second computer system for at least the same reasons as discussed above with respect to the rejection of claim 1 over Boyle.

For at least these reasons, Boyle does not anticipate claim 23. Claims 24-29 depend from claim 23 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 23-29 is respectfully requested.

In contrast to claim 30, Boyle does not disclose or suggest a computer system having a name resolution module for amending requests for access to documents to replace a user-friendly handle with a machine location.

Rather, Boyle discloses obtaining an IP address of a computer system using an ARP process. The ARP process does not include replacing a user-friendly handle in a request with a

machine location at the computer system for at least the same reasons as discussed above with respect to the rejection of claim 1 over Boyle.

For at least these reasons, Boyle does not anticipate claim 30. Claims 31-34 depend from claim 30 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 30-34 is respectfully requested.

In contrast to claim 35, Boyle fails to disclose or suggest amending at the accessing computer system a request from a user of the accessing computer system for access to documents to replace a user-friendly handle with a machine location of a publishing computer system.

Rather, Boyle discloses obtaining an IP address of a computer system using an ARP process. The ARP process does not include replacing a user-friendly handle in a request with a machine location at the accessing computer system for at least the same reasons as discussed above with respect to the rejection of claim 1 over Boyle.

For at least these reasons, Boyle does not anticipate claim 35. Claims 36-42 depend from claim 35 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 35-42 is respectfully requested.

Reiche

Claims 1-4, 7-8, 10-11, 16, 23-26, 30-33, and 35-38 have been rejected under 35 U.S.C. 102(b) as being anticipated by Reiche (U.S. Patent No. 6,092,196, hereinafter "Reiche"). Applicants respectfully traverse the rejection.

In contrast to claim 1, Reiche does not disclose or suggest replacing at a second computer system a user-friendly handle with a machine location of a first computer system in a request from a user of the second computer system.

Rather, as noted in the Office Action, a customer server 126 in Reiche receives a message from a client computer 100 requesting a connection. Applicants note the server 126 in Reiche is not equivalent to the second computer system recited in claim 1 because the request is not from the user of the server. Rather, the request is from the user of the client 100, which is shown connected to the server 126 over a network 160. See Reiche, FIG. 1. The server 126 can initiate

an authentication procedure by redirecting the client 100 to the authentication server 110. See Reiche, col. 8, l. 61 through col. 9, l. 9.

Redirecting the client 100 does not include replacing a user-friendly handle with a machine location as recited in claim 1. The authentication server 110 is not equivalent to the first computer system of claim 1 because the authentication server 110 does not store documents to which access is requested by the client computer 100. Furthermore, even if the authentication server 110 is equivalent to the first computer system of claim 1, a point Applicants do not concede, Reiche, at best, discloses replacing *the machine location* of the client server 126 with the machine location of the authentication server 110. No disclosure is made in Reiche of removing a user-friendly handle and substituting a machine location in place of the user-friendly handle as part of the redirect procedure. After being authenticated, the client computer 100 makes another request to the server 126. No disclosure is provided in Reiche to indicate the client 100 replaces a user-friendly handle of the server 126 with a machine location of the server 126 when making this request.

The Office Action asserts exposing a second node to a machine location is equivalent to replacing a user-friendly handle with a machine location. See the Office Action, page 4, lines 9-12. However, this interpretation is inconsistent with the definition of "replace" as discussed above with respect to the rejection of claim 1 over Lui. The Action fails to describe how exposure of a machine location is equivalent to replacement. It is respectfully suggested that such an analogy is inaccurate.

Also, it is unclear to what step in Reiche "exposing a second node to a machine location" refers. If exposing the second node to a machine location refers to the redirect of the client 100 from the client server 126 to the authentication server 110, then exposing the second node is not equivalent to replacing a user-friendly handle with a machine location of the first computer system. As noted above, the authentication server 110 is not equivalent to the first computer system recited in claim 1.

For at least these reasons, Reiche does not anticipate claim 1. Claims 2-6 depend from claim 1 and are allowable for at least the same reasons. Withdrawal of the rejection and

allowance of claims 1-6 is respectfully requested. If the Applicants have misunderstood the rejection, the Examiner is invited to call the undersigned at the below-listed telephone number.

In contrast to claim 7, Reiche does not disclose or suggest resolving at an accessing node a user-friendly handle with a machine location of a publishing node in a request for access to documents stored on the publishing node made from the accessing node.

As noted above with respect to the rejection of claim 7 over Lui, the term "resolve" as used in claim 7 means to replace the user-friendly handle with the machine location. In contrast, Reiche discloses redirecting a client 100 from a client server 126 to an authentication server 100. Redirecting the client 100 as disclosed in Reiche is not equivalent to replacing a user-friendly handle with a machine location for at least the same reasons as discussed above with respect to the rejection of claim 1 over Reiche.

For at least these reasons, Reiche does not anticipate claim 7. Claims 8-22 depend from claim 7 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 7-22 is respectfully requested.

In contrast to claim 23, Reiche does not disclose or suggest amending at a second computer system a request from a user of the second computer system to replace a user-friendly handle in a request with a machine location of a first computer system storing requested documents.

In contrast, Reiche discloses redirecting a client 100 from a client server 126 to an authentication server 100. Redirecting the client 100 as disclosed in Reiche is not equivalent to replacing a user-friendly handle in a request with a machine location for at least the same reasons as discussed above with respect to the rejection of claim 1 over Reiche.

For at least these reasons, Reiche does not anticipate claim 23. Claims 24-29 depend from claim 23 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 23-29 is respectfully requested.

In contrast to claim 30, Reiche does not disclose or suggest a name resolution module for amending requests for access to documents to replace a user-friendly handle with a machine location of a second computer system on which the documents are stored.

In contrast, Reiche discloses redirecting a client 100 from a client server 126 to an authentication server 100. Redirecting the client 100 as disclosed in Reiche is not equivalent to amending a request to replace a user-friendly handle with a machine location for at least the same reasons as discussed above with respect to the rejection of claim 1 over Reiche.

For at least these reasons, Reiche does not anticipate claim 30. Claims 31-34 depend from claim 30 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 30-34 is respectfully requested.

In contrast to claim 35, Reiche fails to disclose or suggest amending at an accessing computer system a request from a user of the accessing computer system to replace a user-friendly handle with a machine location of a publishing computer system.

Reiche discloses redirecting a client 100 from a client server 126 to an authentication server 100. Redirecting the client 100 as disclosed in Reiche is not equivalent to replacing a user-friendly handle with a machine location for at least the same reasons as discussed above with respect to the rejection of claim 1 over Reiche.

For at least these reasons, Reiche does not anticipate claim 35. Claims 36-42 depend from claim 35 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 35-42 is respectfully requested.

Obviousness Rejections

Claims 2, 8, 16, 24, 31, and 36 have been rejected under U.S.C. 103(a) as being unpatentable over Boyle, as applied to claims 1, 7, 15, 23, 30, and 35 above, and further view of Huitema et al. (U.S. Patent No. 7,065,587, hereinafter "Huitema"). Applicants respectfully traverse the rejection.

Claim 2 depends from claim 1 and is allowable over Boyle for at least the same reasons as discussed above with respect to claim 1.

Huitema does not overcome the shortcomings of Boyle. Huitema also does not disclose or suggest replacing at a second computer system a user-friendly handle with a machine location in a request from a user of the second computer system for documents stored at the first computer system. Huitema discloses converting a friendly-name into a PeerID. See *Huitema*, col. 15, lines 49-50 and col. 17, lines 5-9. No disclosure is made in Huitema that this conversion is made at a second computer system to a request by a user of the second computer system to access documents stored on a first computer system.

For at least these reasons, Boyle would not lead a person skilled in the art to the invention of claim 2, even in view of Huitema. Withdrawal of the rejection and allowance of claim 2 is respectfully requested.

Claims 8 and 16 depend from claim 7 and are allowable over Boyle for at least the same reasons as discussed above with respect to claim 7.

Huitema does not overcome the shortcomings of Boyle. Huitema also does not disclose or suggest resolving at an accessing node a user-friendly handle identifying a principal with a machine location in a request for access to documents made from the accessing node. At best, Huitema discloses converting a friendly-name into a PeerID. No disclosure is made in Huitema that this conversion is made at an accessing node to a request by a user of the accessing node to access documents stored on a publishing node.

For at least these reasons, Boyle would not lead a person skilled in the art to the invention of claims 8 and 16, even in view of Huitema. Withdrawal of the rejection and allowance of claims 8 and 16 is respectfully requested.

Claim 24 depends from claim 23 and is allowable over Boyle for at least the same reasons as discussed above with respect to claim 23.

Huitema does not overcome the shortcomings of Boyle. Huitema also does not disclose or suggest amending at a second computer system a request for access to documents from a user of the second computer system to replace a user-friendly handle with a machine location of a first computer system storing the documents. At best, Huitema discloses converting a friendly-

name into a PeerID. No disclosure is made in Huitema that this conversion is made at a second computer system to a request by a user of the second computer system to access documents stored on a first computer system.

For at least these reasons, Boyle would not lead a person skilled in the art to the invention of claim 24, even in view of Huitema. Withdrawal of the rejection and allowance of claim 24 is respectfully requested.

Claim 31 depends from claim 30 and is allowable over Boyle for at least the same reasons as discussed above with respect to claim 30.

Huitema does not overcome the shortcomings of Boyle. Huitema also does not disclose or suggest a computer system having a name resolution module for amending requests for access to documents to replace a user-friendly handle with a machine location of a second computer system on which the documents are stored. At best, Huitema discloses converting a friendly-name into a PeerID. No disclosure is made in Huitema that this conversion is made at the computer system requesting access to documents.

For at least these reasons, Boyle would not lead a person skilled in the art to the invention of claim 31, even in view of Huitema. Withdrawal of the rejection and allowance of claim 31 is respectfully requested.

Claim 36 depends from claim 35 and is allowable over Boyle for at least the same reasons as discussed above with respect to claim 35.

Huitema does not overcome the shortcomings of Boyle. Huitema also does not disclose or suggest amending at the accessing computer system a request for access to documents from a user of the accessing computer system to replace a user-friendly handle with a machine location of a publishing computing system. At best, Huitema discloses converting a friendly-name into a PeerID. No disclosure is made in Huitema that this conversion is made at an accessing computer system to a request by a user of the accessing computer system to access documents stored on a publishing computer system.

For at least these reasons, Boyle would not lead a person skilled in the art to the invention of claim 35, even in view of Huitema. Withdrawal of the rejection and allowance of claim 35 is respectfully requested.

Claims 9 and 18 are rejected under U.S.C. 103(a) as being unpatentable over Boyle, as applied to claims 7 and 17 above, and further view of Johnson (U.S. Patent No. 7,131,001, hereinafter "Johnson"). Applicants respectfully traverse the rejection.

Claims 9 and 18 depend from claim 7 and are allowable over Boyle for at least the same reasons as discussed above with respect to claim 7.

Johnson does not overcome the shortcomings of Boyle. Johnson also does not disclose or suggest resolving at an accessing node a user-friendly handle with a machine location of a publishing node in a request for access made from the accessing node to documents stored on the publishing node.

Rather, Johnson is directed to unlocking additional features of a software program through a request to the manufacturer. See *Johnson*, col. 4, lines 58-65. Host 18 determines the identification number associated with the component (by checking the identification number stored in memory 16). See *id.* at col. 5, lines 36-57. Host 18 then sends the identification number to the manufacturer to identify to the manufacturer which component the user wishes to unlock. See *id.* The manufacturer receives the request information and determines the appropriate manufacturer's key for the particular component and sends this key back to host 18. See *id.*

Contrary to the assertion on page 5 of the Office Action, replacing the identification number with a memory location. The host 18 sends the identification number itself to the manufacturer. The host 18 sends back a key for unlocking a component identified by the identification number.

For at least these reasons, Boyle would not lead a person skilled in the art to the invention of claims 9 and 18, even in view of Johnson. Withdrawal of the rejection and allowance of claims 9 and 18 is respectfully requested.

Conclusion

Applicants do not concede the correctness of the above rejections and reserve the right to make additional arguments if necessary. In view of the above amendments and remarks, Applicant respectfully requests a Notice of Allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.

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Date: November 12, 2007

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